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11911501 / Madison County  
Wood River / Amoco-Main



**Amoco Oil Company**  
200 East Randolph Drive  
P.O. Box 6110A  
Chicago, Illinois 60680

Region  
Sub F

September 18, 1984

**Certified Mail P16 2198300**  
**Return Receipt Requested**

Mr. Mark A. Haney  
Manager, Groundwater Compliance Sub-Unit, DLPC  
Illinois Environmental Protection Agency  
2200 Churchill Road  
Springfield, IL 62706

EPA Region 5 Records Ctr.  
291097

Dear Mr. Haney:

Groundwater Monitoring Deficiencies at Amoco Main Plant Site, ILD 980700967

As a result of the Compliance Inquiry Letter received by Amoco on May 24, 1984, we are responding to the deficiencies and alleged violations of Title 35: Illinois Administrative Code, Subtitle G, Subpart F, Groundwater Monitoring. The deficiencies and allegations were reviewed on a point-by-point basis in the meeting of July 23, 1984 attended by you and Dale Helmers from IEPA with R. A. Sumner, R. C. Vaseleski, and E. J. Sullivan representing Amoco. The following narrative outlines the compliance program proposed by Amoco and agreed to by all parties at the July 23, 1984 meeting.

In order to meet the Class I compliance requirements, it was agreed that additional monitoring wells would be installed at the Spray Pond area. The installation of three upgradient and four downgradient wells in the uppermost aquifer was completed August 27, 1984. The seven wells are shown on Figure 1.

To further fulfill the Class I requirements, a geohydrologic subsurface investigation is being conducted by Amoco's Groundwater Management section to develop recommendations to be made to IEPA for a program of monitoring wells for the upper groundwater table. This study will assist in characterizing the upper groundwater table as well as address perched water potential, level fluctuation, and vertical flow component. Initial recommendations will be submitted to IEPA by October 1, 1984. Assuming IEPA approves the recommendations for the upper groundwater table monitoring wells by October 15, 1984, these wells will be installed by January 1, 1985 by Amoco's Groundwater Management Section.

The construction and installation of all monitoring wells was supervised by a qualified geologist from Amoco's Groundwater Management Section. After completion of construction, the wells were developed by air jetting.

The Class III violations listed were previously addressed in correspondence between Amoco and IEPA dated May 10, 1983, July 19, 1983, and March 13, 1984. Please also note that as a result of the aforementioned July 23, 1984

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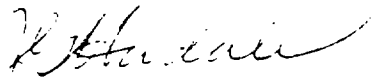
Mr. Mark A. Haney  
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meeting, it was agreed that the data from the June, 1984 sampling will not be compared to the previous four quarters and statistically evaluated for significant deterioration.

Per the IEPA inspection, the groundwater monitoring plan was deemed insufficient in several areas. The groundwater monitoring plan is being revised to include a regional hydrogeologic map showing recharge and discharge areas, generalized groundwater flow lines, and delineation of waste management areas. The groundwater monitoring plan will also be revised to more clearly state field procedures and provide provisions to prevent cross-contamination between wells. The plan will be completed by November 1, 1984.

If there are further questions regarding groundwater monitoring, please contact E. J. Sullivan in Chicago at (312) 856-5858 or R. A. Sumner in Wood River at (618) 251-2228.

Yours truly,



J. G. Huddle  
Director, Environmental Control  
and Planning  
Mail Code 1203

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